

BARATTA & FENERTY, LTD.
BY: ANTHONY P. BARATTA, ESQ.
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Attorney for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

RUSSIAN TV PHILADELPHIA, INC. :
and IGOR SHTERN, Designated :
Lessee, : CIVIL ACTION NO.02-8626
Plaintiffs :
vs. :
ASTEROID PROPERTIES, INC and :
STANLEY BURAKOVSKY, :
Individually and as Chief :
Executive Officer, Director, :
Shareholder and Owner of :
ASTEROID PROPERTIES, INC. :
Defendants :

ORDER

AND NOW, this day of , 2004, upon
consideration of Plaintiffs' Motion to Compel Answers to discovery
requests, it is hereby ORDERED that Defendants, ASTEROID
PROPERTIES, INC. AND STANLEY BURAKOVSKY, shall answer Plaintiffs'
Trial Interrogatories and Expert Witness Interrogatories within
twenty (20) days of the date of this Order or be precluded from
offering testimony at trial.

J.

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STANLEY BURAKOVSKY,	:	
Individually and as Chief	:	
Executive Officer, Director,	:	
Shareholder and Owner of	:	
ASTEROID PROPERTIES, INC.	:	
Defendants	:	

PLAINTIFFS' MOTION TO COMPEL DEFENDANTS'
ANSWERS TO DISCOVERY

Plaintiffs, RUSSIAN TV PHILA., INC. and IGOR SHTERN, move this Honorable Court, by and through their counsel, Anthony P. Baratta, Esquire, to compel Defendants, ASTEROID PROPERTIES, INC. AND STANLEY BURAKOVSKY, to provide full and complete answers to Plaintiffs' Interrogatories as follows:

1. On November 25, 2003, Plaintiffs served on Defendants, ASTEROID PROPERTIES, INC. and STANLEY BURAKOVSKY, Expert Witness Interrogatories and Trial Interrogatories, the responses to which

were due on or before December 26, 2003.

2. As of this date, no responses or objections have been provided to these discovery requests.

3. All information sought is discoverable.

4. Plaintiffs have made a good faith effort to secure the requested information without court action. (See Exhibit "A" attached hereto).

5. Plaintiffs are unable to adequately prepare for trial and proceed with appropriate discovery until such time as the Defendants respond to Plaintiffs' discovery requests.

WHEREFORE, Plaintiffs request Your Honorable Court to enter an Order directing Defendants, ASTEROID PROPERTIES, INC. and STANLEY BURAKOVSKY, to provide full and complete responses to Plaintiffs' Trial Interrogatories and Expert Witness Interrogatories within twenty (20) days or be precluding from offering testimony at trial.

BARATTA & FENERTY, LTD.

BY: _____
ANTHONY P. BARATTA, ESQ.
Attorney for Plaintiffs

VERIFICATION

ANTHONY P. BARATTA, ESQ., hereby states that the facts as set forth in the foregoing Motion to Compel are true and correct to the best of his knowledge, information and belief. Further, he understands that false statements therein made are subject to the penalties provided under the appropriate laws and rules relating to unsworn falsification to authorities.

ANTHONY P. BARATTA, ESQ.

DATE: January 14, 2004

CERTIFICATION

ANTHONY P. BARATTA, ESQ., hereby certifies that he caused to have placed in the U.S. mails on January 14, 2004, a true and correct copy of the within Motion to Compel, addressed to:

*Elizabeth F. Walker, Esquire
Kennedy, Walker & Lipski
1818 Market Street, Suite 2510
Phila., Penna. 19103*

DATE: January 14, 2004

CERTIFICATION OF GOOD FAITH

The undersigned counsel for Plaintiffs certifies and attests that he has communicated with opposing counsel regarding the discovery matter contained in the foregoing discovery Motion in an effort to resolve the specific discovery disputes at issue and, further that despite counsel's good faith attempts to resolve the disputes, have been unable to do so.

CERTIFIED TO THE COURT BY:

ANTHONY P. BARATTA, ESQ.
Attorney for Plaintiffs

Dated: January 14, 2004